

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

MICHAEL KULAKOWSKI,)	
)	
Plaintiff,)	Case Number: 3:16-CV-02510
vs.)	
)	Judge Crenshaw
WESTROCK SERVICES, INC.,)	Magistrate Judge Newbern
)	
Defendant,)	
)	
_____)	

**NOTICE OF FILING EXHIBITS TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

Plaintiff files the following Exhibits to Plaintiff's Opposition to Defendant's Motion for
Summary Judgment:

Depositions

1. 11/15/17 Deposition of Terri Henley
2. 11/7/17 Deposition (excerpts) of Michael Kulakowski
3. 12/18/17 Deposition of Jeb Bell
4. 11/16/17 Deposition of Donald Charles Taylor
5. 11/9/17 Deposition of Larry L. Eden
6. 11/16/17 Deposition of Tracie Duncan
7. 12/21/17 Deposition of William Lee "Tommy" Whited
8. 10/24/17 Deposition of Terry Anthony Stafford
9. 11/15/17 Deposition of James Keith Hall

10. 11/15/17 Deposition of Michael P. White
11. 11/16/17 Deposition of Jerry Wayne Harville
12. 11/9/17 Deposition (excerpts) of Tracye Bryant

Deposition Exhibits

13. Exhibit 3- Kulakowski Handbook Acknowledgements
14. Exhibit 4- 5/2011 Employee Handbook
15. Exhibit 5- 11/01/13 Employee Handbook
16. Exhibit 8- Investigation Notes 8/16/16
17. Exhibit 9- Kulakowski Notes
18. Exhibit 14- 8/29/16 Email/Duncan Notes
19. Exhibit 15- 10/31/13 Global Compliance Report re: Whited
20. Exhibit 16- 8/17/16 Updated Report
21. Exhibit 17- 8/18/16 Email thread
22. Exhibit 18- Investigation Notes
23. Exhibit 19- Investigation Summary
24. Exhibit 21- Investigation Notes, Michael Kulakowski
25. Exhibit 23- 8/27/16 Email
26. Exhibit 24- Separation Notice
27. Exhibit 25- 8/8/16- 8/23/16 Email thread
28. Exhibit 27- Email Re: Exit Interview with Johanna
29. Exhibit 28- 8/29/16 Email

Declarations

30. Declaration of Michael Kulakowski

31. Declaration of Mike White

Other

32. Counter-Complaint Against Tommy Whited

Respectfully submitted,

COLLINS & HUNTER, PLLC

/s/ Heather Moore Collins

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been served this 26th day of February 2018 by electronic mail through the ECF system to Attorneys for Defendant Mary Dohner-Smith, Marcia McShane, Nelson Suarez, Constangy, Brooks, Smith & Prophete, LLP, 401 Commerce St., Suite 1010, Nashville, TN, 37219, MDohner@constangy.com

/s/ Heather Moore Collins

Heather Moore Collins